

DNR / PEI FILE EXCHANGE NOTES

July 27, 2005

File drop-off:

- **POLICY/GUIDANCE AND/OR JUDGMENT ISSUES:**

9LTE43, Mel's Repair Service, What Cheer, State lead CRPCA 0404-37, RT2, LR, post OE w/ 6 month gw samples SMR reclass H2N, recommend reject (Rev-KP, QA-KM). Aon-JRG/TVB. Expedite review requested.

Selected section as presented in the draft RP letter:

Note to DNR: PEI assumed the 12/31/02 CGP responses to 7/12/02 department's letter accepting the high risk classification for the site were reviewed by the department.

Note to DNR: "Teleconference" format was considered. However, due to core issues/deficiencies #1, #2, #3 and #4 "reject" letter template was used. Note, if listed deficiencies are adequately explained/addressed, the site may be reclassified to low risk. Be aware, deficiencies #2 and #3 appear problematic. Soil greater than 2.32 ppm SSTL (identified in the RFP and contract to be removed) may remain. Contract/RFP elements were considered.

Deficiencies in the revised Tier 2 report are listed below for the benefit of your consultant. Correction or clarification of these deficiencies is required before the report can be accepted.

1. **For DNR review:** The overexcavation (OE) data is not accepted. The OE report was not provided with the revised Tier 2 and/or located in the department's file. Refer to section 5.6 of the Tier 2 guidance for the OE reporting requirements. Provide all the required maps, tables and diagrams. Ensure field screening and soil sampling locations are clearly identified in relation to the original soil contamination. Refer to deficiency #2.
2. **For DNR review:** The soil benzene maximum used in the Tier 2 report is questioned. The removal of soil contamination from the site is questioned pending explanation and OE documentation. From the limited information provided in the report (Excavation Field Screening Results table and Soil Analytical Data table) it appears soil contamination greater than the SSTL (2.32 ppm benzene) outlined in the RFP/contract remains at the site. Note: diagrams with the lateral and vertical OE extent were not provided. For example, MW-1 soil data were ignored without justification. The elevation of the soil sample MW-1 (7.08 ppm benzene, 3/3/98) is 732.92 ft ASL (e.g. 17.5 ft bgs). The deepest OE soil sample data presented in the Soil Analytical Data table is for B-22 (734.28 ft ASL or 16 ft bgs). Ignoring MW-1 soil data appears unjustified. Please provide clear concise diagrams with the extent of OE in relation to soil contamination. Provide justification for ignoring any data for the Tier 2 reevaluation. Refer to deficiency #3. Be advised, if justification/explanations are inadequate or can not be provided, the benzene soil source appears to be MW-1 (7.08 ppm at 732.92 ft ASL or 17.5 ft bgs). Please reevaluate all affected pathways and revise all affected Tier 2 report elements.
3. **For DNR review:** The OE soil sampling is questioned. From the limited information provided the choice of soil samples for lab analysis is questioned. For example, from the samples labeled N1 through N6 (refer to Excavation Field Screening Results table), a soil sample N2 (PID reading "552") was sent for lab analysis. The highest PID from samples N1 through N6 was identified in sample N1 ("1857"). N1 was not sent for lab analysis. Please provide an adequate explanation/justification for soil samples chosen for lab. If adequate explanation is not provided additional soil sampling may be required to verify soil contamination was removed.

Refer to file deliverables and draft RP letter for additional text, issues and def's RE: PWL's.

7LTI52, Former 4 Son's Handy Shop, Stuart, Reclassification SMR H2N (4) plus T2 revisions and T2 addendum (in association with T3 Work Plan). Reject RP letter template considered due to numerous def's and issues. However, due to site specifics, accept letter format provided with an extended memo to CGP (Rev-MH, QA-KM).

Selected section as presented in the draft RP letter:

Note to DNR: High risk GWI-PWL Division Street segment replaced (PWL within actual benzene plume + 50ft per JH/departement 7-22-02 e-mail). However, as presented in the 5/04 SMR, and as a result of the 7-22-02 e-mail, the Division Street PWL (PWL-S segment) Computed Risk is 'H' as PWL remains within the 290 benzene RID plume. "Reject" letter template was considered due to high risk PWL segment, however, accept based on CGP compliance with 7-22-02 DNR e-mail. Refer to 5/04 SMR, p. 7, for CGP explanation and recommendation.

Note to DNR: GVES reclassified H2N through GW vapor (SG1, 1B, 1C) at the GW benzene source MW-2 and DNR acceptance (9-8-04 e-mail) of CGP proposal to waive 6 month waiting period.

For DNR Review: Your groundwater professional has recommended the site be reclassified from **high risk** to no action required in the 9/04 SMR. The Groundwater Ingestion pathway was reclassified from high risk to no action required through well abandonment/plugging of drinking water well DWW#1 (5-4-04 SMR) and through meeting SSTLs/steady and declining criteria for drinking water well DWW#3 (9-27-04 SMR). The Groundwater-Plastic Water Line pathway was reclassified from high risk to no action required through replacement of plastic water line segments within the actual benzene plume plus 50ft in accordance with the department's 7-22-02 e-mail. Be advised the Groundwater-Plastic Water Line pathway 'high' to 'no action required' reclassification is accepted with reservations because the "PWL-S, Division Street" receptor remains within the Groundwater-Plastic Water Line 290ppb benzene RID plume and technically is high risk. Groundwater Vapor pathways were reclassified through groundwater vapor sampling (SG1, 1B, 1C) at the groundwater benzene source MW-2, and in association with the department's 9-8-04 waiver based on your CGP's representation. Upon review of the reports and file information, we are accepting the recommendation with reservations. The department is assigning the site a "**No Action Required**" classification. No additional action is required at this time. We will update our records to show the change in status.

Refer to file deliverables, draft RP letter and Memo to CGP for text, details, issues and def's.

7LTV15, Reasoner Oil, Creston, SMR Reclass H2L, Post MOA/OE, BIOX treatment, SMR not accepted, def's TBA in next remediation SMR, site specifics required various modification to RP draft letter (Rev-TG, QA-KM). TVB

Selected section as presented in the draft RP letter:

Note to DNR: Groundwater benzene concentrations increased in 2 of 4 wells tested 6 months following BIOX injection. The GW source (B16) increased >20%: 5310 ppb to 12,500 ppb. DNR e-mails to Seneca (5/9/05, 5/11/05) state that remodeling due to the >20% increase is not required, and soil gas testing at the GW source is not required (was completed anyway). The e-mails also do not identify the lack of GW sampling at MW36 among MOA items that had not been met.

The department received the post-remediation reclassification Site Monitoring Report (SMR) for the site on 6/6/05. The SMR contains various analytical data collected at the site following corrective action by BIOX injection during September of 2004. Thank you for the submittal. The above referenced site was previously accepted as high risk. The memorandum of agreement (MOA) for the site dated 8/4/04 lists the schedule and activities to be completed during the proposed corrective action. The SMR received on 6/6/05 appears to recommend the site be reclassified to "low risk". We have conducted a completeness review of the SMR. An SMR is considered to be complete if it contains all the information and data required by the DNR's administrative rules and guidance.

FOR DNR REVIEW: Upon review of the reports and file information, we cannot accept the SMR at this time. **However, a site classification of low risk appears to be acceptable, pending correction of deficiencies in the SMR. Additional groundwater monitoring at MW36 is required as stated in the 8/8/04 MOA.**

Refer to file deliverables, draft RP letter for additional text, details, issues and def's.

The department has identified some technical problems which may not be acceptable in future SMR submittals. These problems do NOT require correction in the report, but are identified below for the attention and benefit of your consultant.

1. **FOR DNR REVIEW:** Soil sampling conducted before and after BIOX application established the current soil source as SG4AR-B (3/31/05, B=1.8 ppm, elev.=1292.84', x/y=105/207, ground elevation = 1298.84 feet above sea level (ASL)). The soil vapor to enclosed space – confined space residential (SVES-CSR) target level of B=1.16 ppm is exceeded, and the receptor summary tables identify the SVES-CSR-potential and SL-CSR-potential pathways as low risk. The soil gas testing at SG5AR on 5/13/05 (approx. elev. 1292.19', x/y=102/210), conducted to address the groundwater vapor pathway, also appears applicable to the SVES and SL pathways. (Be advised, the 5/26/2005 SG5AR cannot be used or applied to the Soil Vapor to Enclosed Space/Soil Leaching to Groundwater Vapor to Enclosed Space pathway because neither the sample elevation (1291.60 feet ASL) nor the Top of Screen (in this case bottom of direct push pipe/top of exposed soil) elevation 1292.60 feet ASL intersect the soil source elevation 1292.84 feet ASL) Based on aforementioned information, it appears that Soil Vapor to Enclosed Space/Soil Leaching to Groundwater Vapor to Enclosed Space classification recommendation of no further action may be achieved through one additional passing soil gas sample at the soil source elevation of 1292.84 ASL (or 6' below ground). However the department questions ground elevations reported for SG4AR-B (1298.84 feet ASL) compared to SG5AR (1296.60 feet ASL) when the sample locations are apparently within 5 feet of each other.

Be advised, the apparent two feet ground elevation discrepancy between SG4AR-B (1298.84 feet ASL) and SG5AR (1296.60 feet ASL) must be addressed, explained or ground elevations revised. Accurate ground elevation and resultant sample elevation are material, relevant, and applicable for appropriate future Soil/Soil Leaching pathway evaluations.

Refer to file deliverables and draft RP letter for additional text and def's.